

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ROBERT HAMLEN,

Plaintiff,

v.

GATEWAY ENERGY SERVICES  
CORPORATION,

Defendant.

Civil Action No. 7:16-cv-03526-VB-JCM

Motion for Leave to File an

Amended Class Action Complaint

**PLAINTIFF'S MOTION  
FOR LEAVE TO FILE AN AMENDED CLASS ACTION COMPLAINT**

Please take notice that Plaintiff Robert Hamlen, by his attorneys, Finkelstein, Blankinship, Frei-Pearson & Garber, LLP, respectfully moves this Court for leave to file the attached Amended Class Action Complaint (Exhibit 1). Plaintiff has also attached a redlined version of the Amended Class Action Complaint, noting any and all changes from the original Complaint (Exhibit 2). Plaintiff files this motion pursuant to Rules 15, 20, and 21 Federal Rules of Civil Procedure, for the reasons set forth in the accompanying Memorandum of Law in Support of Plaintiff's Motion for Leave to File an Amended Class Action Complaint.

Dated: August 16, 2017  
White Plains, New York

**FINKELSTEIN, BLANKINSHIP,  
FREI-PEARSON & GARBER, LLP**

/s/ D. Greg Blankinship

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